

## Remarks

The present response is to the Notice of Non-Compliant Amendment mailed in the above-referenced case on 04/25/2002. The Notice states that the following items are required for compliance: "Marked up copies of claims 1 and 3."

Claims 1 and 3 were not amended in the rejected response, and stand in exactly their wording prior to that response. There is therefore no requirement for a marked-up copy of claims 1 and 3. I cannot provide it. I did not change them. The marked up claims in the section entitled "Version With Markings to Show Changes Made" are indeed the only claims amended.

Further, the present amendment is responsive to the Office Action mailed in the above-referenced case on February 27, 2002. Claims 1, 3-7, 9-13 and 15-16 are presented for examination.

In the Office Action Examiner objects to claim 15 as it depends from canceled claim 14. Claims 5-6, 11-12, 15-16 and 17 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Claims 1, 7, 13 and 15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Williams et al., hereinafter Williams.

In response to the above informalities and merit rejections, applicant herein amends the claims appropriately to correct the informalities, and presents further argument to more particularly point out the subject matter regarded as the invention, and to establish that the claims distinguish unarguably over the prior art cited and applied by the Examiner. Applicant points out and argues the key limitations in the base claims that the Examiner appears to have misunderstood in his rejections and statements.

Regarding claim 5 and 11 applicant amends the language of the claims to clearly recite that the incoming IPNT call is the same call as the

IPNT call received from the caller. Regarding claim 15 applicant amends the claim to change the dependency from canceled claim 14 to claim 13. Applicant herein further amends claim 15 to clearly recite that "the first network" is the network associated with the first port as recited in claim 13, and that "the second network" is the network associated with the second port of claim 13. Regarding claims 16 and 17 applicant herein similarly amends the language of the claims to clearly recite that the "first network protocol and second network protocol" are the protocols associated with the first port and second port of claim 13 respectively. Said amendments to the above claims are detailed in the markups section of this response.

The Examiner has rejected claims 1, 7, 13 and 15 under 35 U.S.C. 103(a) as being unpatentable over Williams. Applicant has began carefully studied the reference of Williams, and the Examiner's rejections and remarks, and in response, applicant herein provides further convincing arguments clearly showing that Williams, as a primary reference, fails to support the obviousness rejection asserted by the Examiner.

Regarding claim 1 the Examiner states that Williams discloses a bridge unit comprising a trunk-line port for receiving and placing COST calls, a data network port for receiving and placing IPNT calls, conversion circuitry converting voice to digital data and formatting data into Internet protocol, and control routines wherein a first call is dynamically converted and placed on the other network allowing for two people to have a live conversation. The Examiner admits however that Williams does not specifically disclose dynamically allowing two people to engage in a live conversation where one is on the Internet and the other is on a COST network, further stating that the background of Williams teaches that a product, where a user can place the call from either the telephone or a PC, will be available, and it would have been obvious to include dynamically allowing two people to engage in a live conversation where one is on the

Internet using a PC, and the other is on a COST network, in order to increase the flexibility of the system by allowing at least one of the callers to use the multimedia computer to communicate instead of a telephone.

In response applicant strongly reasserts the argument that the system of Williams cannot read on the telephony system as claimed in applicant's claim 1 because it is clear that Williams does not accomplish applicant's claimed invention with a single bridge unit as stated by the Examiner in his remarks. Applicant's claim 1 clearly recites " A computerized telephony bridge unit," wherein control routines functioning as part of the bridge unit receive a first call from one of the COST an Internet networks, place a call associated with the received call on the network other than the network on which the call is received, dynamically converting data between the associated calls.

Williams clearly cannot accomplish applicant's invention with a single bridge unit, and upon further and careful review of Williams it is clear to applicant that there is no motivation or incentive in the art to combine the elements of Williams into a single unit to accomplish the data conversion as claimed in applicant's invention. Williams requires separate servers in separate geographical locations to accomplish the conversion of data between associated calls on different networks, and the participants of the call in Williams are on the same network, not one caller on the Internet and another caller on a COST network, for example, as in applicant's claimed invention. Both the suggestion to combine the elements into a single bridge unit, and the concept of enabling one person on a COST network to engage in live conversation with a person on the Internet, as claimed, and the reasonable expectation of success, are clearly not founded or suggested in the prior art. Williams clearly cannot read on applicant's claimed invention of accomplishing the data conversion with a single bridge unit wherein the participants of a call are on different networks.

Applicant still firmly believes claim 1 is patentable over Williams as argued above. Claims 3-6 as amended are patentable on their own merits, or at least as depended from patentable claim. Claim 7 is applicant's method claim corresponding to applicant's apparatus claim 1, and is therefore patentable over the art of Williams as argued above on behalf of claim 1. Claims 9-12 as amended are patentable on their own merits for at least as depended from a patentable claim.

Claim 13 recites that the data network is the Internet and calls on the Internet are IPNT calls. Applicant reasserts the argument that Williams teaches placing a COST call, transferring the call over a packet network, and placing the call to another COST network. There is no live connection between two users on separate networks in Williams. Further, as argued above by applicant on behalf of claim 1, claim 13 also clearly recites that the data conversion between callers on separate networks is accomplished with a single bridge unit, not through separate servers with separate geographic locations as in the art of Williams. Claim 13 is therefore also clearly patentable over the prior art. Claims 15-17 as amended are patentable on their own merits or at least as depended from a patentable claim.

As all of the claims have been shown to be patentable over the prior art, applicant respectfully requests that the rejections be withdrawn and that the case be passed quickly to issue.

If there are any extensions of time required beyond any extension specifically petitioned and paid with this response, such extensions are hereby requested. If there are any fees due beyond any fees paid by check with this response, authorization is given to deduct such fees from deposit account 50-0534.

**Version With Markings to Show Changes Made**

**In the claims:**

5. (Twice Amended) The bridge unit of claim 1 wherein the control routines receive an incoming IPNT call from a caller, and negotiate with the caller to ascertain a COST telephone number to use to place a COST call associated with the incoming IPNT call from the caller.

11. (Twice Amended) The method of claim 7 further comprising a step for receiving an incoming IPNT call from a caller, and negotiating with the caller to ascertain a COST telephone number for placing a call to be associated with the incoming IPNT call from the caller.

15. (Amended) The bridge unit of claim [14] 13 wherein the [first] network associated with the first port is a publicly switched telephony network (PSTN) and the [second] network associated with the second port is the Internet.

16. (Amended) The bridge unit of claim 13 wherein [first] the network protocol associated with the first port is that of a first DNT network, and the [second] network protocol associated with the second port is that of a

second DNT network, wherein the two DNT networks have incompatible data protocols.

Respectfully,  
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by



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